

Exhibit D

Michael Liskow

From: Akerblom, Taylor <taylor.akerblom@whitecase.com>
Sent: Monday, September 26, 2022 8:09 PM
To: Michael Liskow; Janine Pollack; Rosemary Rivas; Steven J. Toll; ggraber@cohenmilstein.com; Eric Kafka; Mark Troutman
Cc: Merryman, Bryan; Havlin, Kim; Mims, Kathryn; Hogue, Frank; Kaul, Sequoia
Subject: In Re: Gerber Products Co. Heavy Metals Baby Food Litig. | Production VOL008

Follow Up Flag: Follow up
Flag Status: Flagged

Counsel,

Gerber has produced documents in production volume 8, identified by production numbers G00111228 - G00122595, which may be accessed via the FTP link below. This production consists of documents from the custodial files of the five secondary custodians. In addition, we learned last week that, while conducting pre-production review early in this process, our e-discovery vendor misclassified documents associated with the primary custodians. As soon as we discovered this issue, we began immediately reviewing these documents and they are also included in this production. Our review of presumptively privileged materials from the agreed-upon custodians is ongoing and may result in the production of additional documents from their files.

FTP: <https://ftpus.consilio.com/public/file/-NNbi1wQVECL-r3uEKjWiw/VOL008.zip>
(expires 10/4/22)

These productions are made pursuant to the terms of the Stipulation and Protective Order entered by the Court on June 27, 2022 (ECF No. 123). Gerber reserves all rights under the order.

The password will be sent under separate cover.

Regards,
Taylor

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